

1 STIP
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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 FRAZIER S. SPEAKS, JR.,

13 Plaintiff,

14 vs.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,

17 Defendant.

CASE NO.: 2:23-cv-00887-APG-MDC

**STIPULATION TO EXTEND DEADLINES
TO RESPOND TO CITY OF NORTH LAS
VEGAS'S MOTION TO DISMISS OR,
ALTERNATIVELY, MOTION FOR
SUMMARY JUDGMENT [ECF Nos. 21, 22]**

(Second Request)

18 Plaintiff, Frazier S. Speaks, Jr. ("Speaks"), by and through his counsel, Melanie Hill Law, and
19 Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Kaempfer Crowell, hereby
20 stipulate to extend the deadline for Mr. Speaks to respond to the City of North Las Vegas's Motion to
21 Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21,
22 22] from the current deadline of September 27, 2024 for an additional 14-days until October 11, 2024.
23 This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein. This is
24 the second request to extend the deadline to respond to these dispositive motions.

25 In support of this Stipulation and Order, the parties state as follows:

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27 1. The current deadline to respond to the City of North Las Vegas's Motion to
28 Dismiss, or, Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21,

1 22] is September 27, 2024. The parties previously stipulated to combine the deadlines that occurred
2 one week apart because the motions were combined into one pleading such that it made the most sense
3 to respond to them together on the same deadline date of September 27, 2024.

4 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional thirty-
5 day extension of the response deadlines due to Plaintiff's counsel dealing with some new health issues,
6 symptoms, and diagnostic testing as well as assisting in the preparation of a Ninth Circuit oral
7 argument currently scheduled for October 11, 2024 which is why counsel originally requested 30
8 additional days. The parties have agreed to stipulate to a 14-day extension of the deadlines for Mr.
9 Speaks to respond to both motions.
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11 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a
12 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to
13 allow counsel for the Plaintiff the additional time requested to respond to these two dispositive motions
14 under the current circumstances for 14-days until October 11, 2024.
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1 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the
2 deadlines for Mr. Speaks to respond to the City of North Las Vegas's Motion to Dismiss, or,
3 Alternatively, Motion for Summary Judgment filed on August 14, 2024 [ECF Nos. 21, 22] from the
4 current deadlines of September 27, 2024 until October 11, 2024.

5 DATED this 27th day of September, 2024.

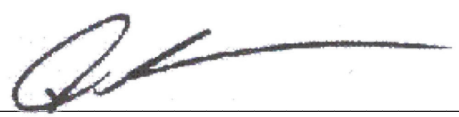
6 **MELANIE HILL LAW PLLC**

7 **KAEMPFER CROWELL**

8 By: /s/ Melanie A. Hill
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By: /s/ Kristopher Kalkowski
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15 IT IS SO ORDERED:

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19 ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

20 Dated: September 30, 2024
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